

1 Regina A. Habermas, Esq.
2 Nevada Bar No. 8481
3 GHIDOTTI | BERGER LLP
4 415 S. 6th Street, #310
5 Las Vegas, NV 89101
6 Tel: (949) 427-2010
7 Fax: (949) 427-2732
8 ghabermas@ghidottiberger.com
9 Attorneys for Secured Creditors,
10 U.S. Bank Trust National Association as Trustee of the Lodge Series III Trust,
11 U.S. Bank Trust National Association as Trustee of the Chalet Series III Trust,
12 U.S. Bank Trust National Association as Trustee of the Bungalow Series IV Trust, and
13 U.S. Bank Trust National Association as Trustee of the Bungalow Series F Trust

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA – LAS VEGAS DIVISION

II | In Re:

Case No.: 09-29123-mkn

MELANIE SCHULTE and
WILLIAM SCHULTE.

Chapter 11

14 2704 SATTLEY LLC,
15 HOT ENDEAVOR LLC,
16 1341 MINUET LLC,
17 1708 PLATO PICO LLC,
18 2228 WARM WALNUT LLC,
19 9425 VALLEY HILLS LLC,
20 9500 ASPEN GLOW LLC,
5218 MISTY MORNING LLC,
CHERISH LLC,
SABRECO INC.,
KEEP SAFE LLC.

Jointly Administered with:

09-27238-BAM

09-27909-BAM

09-27910-BAM

09-27911-BAM

09-27911-BAM
09-27912-BAM

09-27912-BAM
09-27913-BAM

09-27914-BAM

09-27916-BAM

09-27910-BAM
09 28513 BAM

09-28515-BAM
09 31584 BAM

09-31584-BAM
09 31585 BAM

09-51585-BAM

NOTICE OF HEARING

**NOTICE OF HEARING
CLARIFYING STATEMENT**

CLARIFY PLAT REGARDING

REGARDING PROPERTIES

PROPERTIES

W. J. D.

Huang-Tian 8-28

1 **NOTICE IS HEREBY GIVEN** that a Motion to Clarify Plan Treatment Regarding
2 Various Real Properties was filed on May 21, 2021 by Secured Creditors, U.S. Bank Trust
3 National Association as Trustee of the Lodge Series III Trust, U.S. Bank Trust National
4 Association as Trustee of the Chalet Series III Trust, U.S. Bank Trust National Association as
5 Trustee of the Bungalow Series IV Trust, and U.S. Bank Trust National Association as
6 Trustee of the Bungalow Series F Trust (collectively, “Secured Creditors”), creditors in this
7 matter. The Motion seeks the following relief: enter an Order clarifying the treatment of
8 Secured Creditors’ claims in Debtors’ confirmed plan and specifically confirming that the
9 plan did not eliminate the requirement that Debtors make escrow payments to Secured
10 Creditors. Any opposition must be filed pursuant to Local Rule 9014(d)(1).

11 **NOTICE IS FURTHER GIVEN** that if you do not want the court to grant the relief
12 sought in the Motion, or if you want the court to consider your views on the Motion, then you
13 must file an opposition with the court, and serve a copy on the person making the Motion no
14 later than 14 days preceding the hearing date for the motion, unless an exception applies (see
15 Local Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts
16 and legal authority, and be supported by affidavits or declarations that conform to Local Rule
17 9014(c).
18

19 If you object to the relief requested, you *must* file a **WRITTEN** response to this
20 pleading with the court. You must also serve your written response on the person
21 who sent you this notice. If you do not file a written response with the court, or if
22 you do not serve your written response on the person who sent you this notice,
23 then:

- 24 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 25 • The court may *rule against you* without formally calling the matter at the hearing

26 ///
27
28

1 **NOTICE IS FURTHER GIVEN** that the hearing on the said Motion will be held
2 before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas
3 Boulevard South. Bankruptcy Courtroom Number 2, Las Vegas, Nevada 89101 on June 23,
4 2021 at the hour of 9:30 a.m.

5 DATED: May 21, 2021

GHIDOTTI | BERGER LLP

6 By: /s/ Regina A. Habermas, Esq.
7 Regina A. Habermas, Esq.
8 Nevada Bar No. 8481
9 415 S. 6th Street, #310
10 Las Vegas, NV 89101
11 ghabermas@ghidottiberger.com
12 Attorneys for Secured Creditors

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28